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April 14, 2020

**VIA E-MAIL**

E-Mail: [morganywang@gmail.com](mailto:morganywang@gmail.com)

Morgan Wang

Re: Best Western Plus South Bay Hotel, 15000 Hawthorne Blvd., Lawndale

Dear Mr. Wang:

Thank you for speaking with the Kevin Chun, Sean Moore, and me this morning. I apologize for not catching your attorney's last name. As I am unable to locate him or his email address, please forward this letter to him at your convenience. As we discussed, the City of Lawndale ("City" is deeply concerned and disappointed with the contract you have entered into with the County of Los Angeles ("County") to implement the "Project Roomkey" program at the Best Western Plus South Bay Hotel in Lawndale ("Best Western").

The City was informed on April 9, 2020, that you had signed an agreement with the County to allow the Best Western to become a temporary homeless shelter. This agreement was negotiated and executed in complete secrecy and without seeking any input from the City. This program is now expected to begin operations on April 15, 2020 (i.e., only one week after its formal announcement) without any City coordination or consultation.

Had you contacted the City, we would have advised you that the Best Western's land use approvals do not allow the hotel at 15000 Hawthorne Boulevard ("Property") to be converted into a homeless shelter. First, Lawndale Municipal Code Section 17.56.160 defines a hotel as "any structure, or any portion of any structure, which is occupied or intended or designed for occupancy by transients for dwelling, lodging or sleeping purposes, and includes any hotel, inn, or motel designed for occupancy by transients for dwelling, lodging or sleeping purposes for periods not to exceed thirty days, and not less than one full day." Hence, allowing the same people to occupy the Best Western for more than 30 days violates the City's operating regulations for a hotel use.

Second, a homeless shelter is a different type of use than a hotel and is not allowed on the Property by the applicable zoning regulations. The Property is located within the General Commercial zone and within the City's Hawthorne Boulevard Specific Plan ("HBSP") area. A homeless shelter is a different use from a hotel as a shelter also includes health care and substance abuse treatment center uses, which uses are not authorized in the General Commercial zone. In Lawndale, subject to receipt of a special use permit, and the Planning Commission's determination that certain standards will be met, a shelter is only allowed in the Commercial-Manufacturing zone. One of the mandatory standards required to receive a permit for a shelter is that the City has been provided with and approved a written management plan addressing, among other concerns, security, neighborhood communication, loitering control, and refuse control. Additionally, per the land use matrix in the HBSP, Table 2-1, hospitals or substance abuse treatment centers are not

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allowed in the HBSP area and a special use permit is required for a health center operated by a governmental agency for outpatient treatment only. Accordingly, the zoning and HBSP regulations prohibit the operation of a shelter on the Property.

Third, Special Use Permit No. 63 ("SUP") was approved with the adoption of Planning Commission Resolution 81-34 on October 28, 1981 for the construction of a hotel on the Property. Section 1(C) of the SUP states that the hotel may not be used or operated in a manner that is detrimental to health, safety, or general welfare of persons residing or working in the neighborhood. The conversion of the hotel into a shelter, without the conditions the City is required to impose on a shelter, is detrimental to health, safety, or general welfare of residents and businesses surrounding the Property. Therefore, the conversion of the hotel to a homeless shelter violates Section 1(C) of the SUP.

Moreover, the City also believes that this conversions warrants analysis under the California Environmental Quality Act. Yet no analysis has been undertaken of the traffic, noise, public services and other impacts of this proposed new land use.

Nor does the Best Western's business license allow for the operation of a shelter.

For these reasons, while Project Roomkey is a well-intended program to help the most vulnerable homeless in Los Angeles County during the COVID-19 global pandemic, the City believes that allowing the Best Western to operate as a shelter could cause irreparable harm to the Lawndale community. As a result, **if Best Western does not advise the City by 5:00 p.m. tomorrow, April 15<sup>th</sup>, that the agreement between Best Western and the County to allow the hotel to be used as a shelter has been terminated, the City will schedule a public hearing for the Planning Commission to consider revoking the SUP to prevent this from occurring.**

Thank you in advance for considering the above. Please contact me at (949) 250-5411 or [tisrael@awattorneys.com](mailto:tisrael@awattorneys.com) with any questions and to initiate further discussion.

Very truly yours,

ALESHIRE & WYNDER, LLP



Tiffany J. Israel  
City Attorney

TJI:cdd

cc: Kevin Chun, City Manager (via email)  
Sean Moore, Community Development Director (via email)

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